

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. Grace & Co., <u>et al.</u>,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	

ZAI Claimants' Motion for Summary Judgment

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Dated: July 7, 2003

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ZAI Claimants' Motion for Summary Judgment

Pursuant to Fed. R. Civ. P. 56, the ZAI Claimants respectfully move for summary judgment declaring there is no material issue of fact and the ZAI Claimants are entitled to judgment as a matter of law that: (1) ZAI can contaminate homes / pose an unreasonable danger upon disturbance; and (2) ZAI Claimants have viable claims under tort and/or other legal theories in this bankruptcy proceeding. The grounds for this motion are set forth in the accompanying memorandum in support.

Dated: July 7, 2003

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CERTIFICATE OF SERVICE

I, Charles J. Brown, III, hereby certify that I caused a copy of the foregoing to be served upon the attached service list via hand-delivery or federal express.

I certify the foregoing to be true and correct under the penalty of perjury.

Dated: July 7, 2003

/s/ Charles J. Brown, III
Charles J. Brown, III

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